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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

LYNDA DENISE SIMPSON,)	
)	
Plaintiff,)	CASE NO.
)	2:24-cv-00104-MDC
v.)	
)	UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO FILE
MARTIN O'MALLEY,)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
_____)	

Plaintiff, Lynda Denise Simpson, by her attorney, moves for a sixty (60) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed April 15, 2024.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to prepare Plaintiff's brief properly and thoroughly. For instance, between April 5, and June 12, 2024, staff in Counsel's office have one hundred and fifty-five (155) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly

1 prepare the brief by the current deadline. This request will not cause Defendant any undue
2 hardship. This extension is needed to prepare the brief thoroughly and properly.

3 Wherefore, Plaintiff requests an extension from April 15, 2024, up to and including June
4 14, 2024, to file her brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who
5 has no objection to this request.
6

7 Dated April 8, 2024.

8 Respectfully submitted,

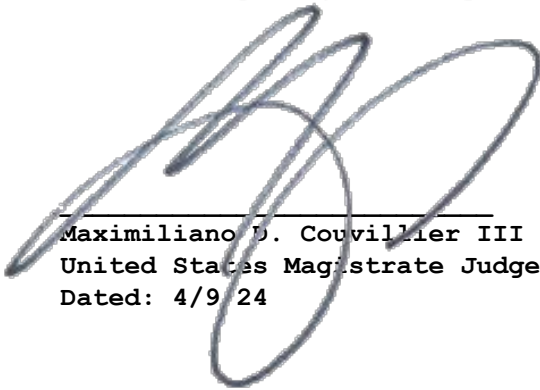
9 /s/Hal Taylor
10 Hal Taylor, Esq.

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12 **Plaintiff's Certificate of Service:**

13 I certify that I caused the Unopposed Motion for Extension of Time to be served today,
14 April 8, 2024, by CME/CF to Blaine T. Welsh, Esq., and Franco Becia, Esq., who are filing users
15 of the CM/ECF system.
16

17 /s/Hal Taylor
18 Hal Taylor
19

20 **IT IS SO ORDERED. Plaintiff shall file her Opening Brief by**
21 **June 14, 2024.**

22
23
24 
25 **Maximiliano D. Couvillier III**
26 **United States Magistrate Judge**
27 **Dated: 4/9/24**
28